

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE	)	Chapter 7
	)	
MATT FORD,	)	Case No. 20-18856
	)	
Debtor.	)	Hon. Timothy A. Barnes

**NOTICE OF ROUTINE MOTION**

TO: Attached Service List

**PLEASE TAKE NOTICE THAT** on January 25, 2021, at 1:00 p.m., I shall appear before the Honorable Judge Timothy A. Barnes, or any other judge sitting in his stead and request a hearing on the Chapter 7 Trustee's Motion to Extend Time to File Objections to Discharge, a copy of which is attached hereto and thereby served upon you.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video,** use this link: <http://www.zoomgov.com/>. Then enter the meeting ID.

**To appear by telephone,** call (669) 254-5252 or (646) 828-7666. Appearing by telephone will require extra clearance before being allowed into the hearing.

**Meeting ID and password.** The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, these motions will be called on the presentment date. If no Notice of Objection is timely filed, the Court may grant the motions in advance without a hearing

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, hereby state that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on the 15th day of January, 2021.

/s/ Gregory K. Stern

Gregory K. Stern

Gregory K. Stern (Atty. ID #6183380)  
Dennis E. Quaid (Atty. ID #02267012)  
Monica C. O'Brien (Atty. ID # 6216626)  
Rachel S. Sandler (Atty. ID #6310248)  
53 West Jackson Boulevard, Suite 1442  
Chicago, Illinois 60604  
(312) 427-1558

**SERVICE LIST**

**Registrants Served Through The Court's Electronic Notice For Registrants**

Patrick S. Layng  
Office of the U.S. Trustee, Region 11  
219 South Dearborn Street, Room 873  
Chicago, Illinois 60604

N. Neville Reid  
Fox, Swibel, Levin & Carroll, LLP  
200 West Madison Street, Suite 3000  
Chicago, Illinois 60606

David M. Siegel  
790 Chaddick Drive  
Wheeling, Illinois 60090

**Parties Served By United States Mail**

Matt Ford  
5451 North East River Road, #711  
Chicago, Illinois 60656

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IN RE	)	Chapter 7
	)	
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Debtor.	)	Hon. Timothy A. Barnes

**ROUTINE MOTION TO EXTEND TIME TO FILE OBJECTIONS TO DISCHARGE**

Now comes N. Neville Reid, Chapter 7 Trustee (the “Trustee”), by and through his attorneys, Gregory K. Stern, Monica C. O'Brien, Dennis E. Quaid and Rachel S. Sandler, and in support of his Motion to Extend Time to File Objections to Discharge, states as follows:

1. On October 18, 2020, Matt Ford (the “Debtor”) caused a Voluntary Petition for relief under Chapter 7 of the United States Bankruptcy Code to be filed; and N. Neville Reid (the “Trustee”) was appointed as trustee in this case.
2. The deadline for the Trustee to file objections to discharge is on or before January 19, 2021.
3. The Trustee has been provided documents from the Debtor related to a Marital Settlement Agreement dated November 29, 2018 wherein the Debtor agreed to transfer his interest in his marital residence located at 7234 W. Berwyn Ave, Chicago, Illinois (the “Real Property”) to his ex-wife in exchange for payments totaling \$47,000.00. Under the Agreement the final payment of \$24,000.00 is due in 2023 (the “Payment”).
4. Neither the Debtor’s transfers of the Real Property nor the Payment were disclosed in the Debtor’s Schedules or Statement of Financial Affairs.
5. The Trustee needs additional time to investigate, review and determine the accuracy and completeness of the information provided for in the Debtor’s Schedules and

Statement of Financial Affairs and determine whether any errors and omissions contained in the Schedules and Statement of Financial Affairs are sufficient to warrant the filing of an adversary complaint objecting to the Debtor's discharge pursuant to 11 U.S.C. §727.

5. The Trustee requests an extension of the deadline to file an objection to discharge pursuant to 11 U.S.C. § 727 up to and including April 30, 2021.

WHEREFORE, the Trustee prays for entry of an Order extending the time to object to discharge pursuant to 11 U.S.C. § 727 to April 30, 2021; and, for such other further relief as this Court deems just.

/s/ Gregory K. Stern  
Gregory K. Stern, Attorney For Trustee

Gregory K. Stern (Atty. ID #6183380)  
Monica C. O'Brien (Atty. ID # 6216626)  
Dennis E. Quaid (Atty. ID #02267012)  
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